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16 *Attorneys for Plaintiff Brian Borenstein*

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 BRIAN BORENSTEIN, an individual,  
20  
Plaintiff  
21

22 vs.

23 THE ANIMAL FOUNDATION, a domestic  
24 nonprofit corporation; *et al.*

25 Defendants  
26

Case No.: 2:19-cv-00985-CDS-NJK

**Order Approving STIPULATION FOR  
EXTENSION OF TIME TO RESPOND  
TO THE ANIMAL FOUNDATION'S  
PARTIAL MOTION FOR SUMMARY  
JUDGMENT  
(First Request)**

[ECF No. 480]

27 COMES NOW Plaintiff, Brian Borenstein, by and through his counsel, Raelene K.  
28 Palmer, Esq. of The Palmer Law Firm, P.C., Robert S. Melcic, Esq. of The Law Office of

1 Robert S. Melcic, and Richard E. Retamar, Esq. of Retamar & Millian, P.A., and Defendants,  
2 The Animal Foundation (“TAF”), by and through its counsel, Brad Lipman, of the law firm  
3 Reid Rubinstein & Bogatz, and County of Clark, by and through its counsel, Jonathan D. Blum,  
4 Esq., of the law firm Wiley Petersen, and hereby request the Court to extend the deadlines for  
5 Plaintiff to respond to *The Animal Foundation’s Partial Motion for Summary Judgment*, from  
6 **Thursday, December 26, 2024 to Thursday, January 16, 2025**, and for TAF to reply thereto  
7 seven days after the response is docketed.

8 WHEREAS:

9 1. On November 22, 2024, this Court ordered Plaintiff to respond to *The Animal*  
10 *Foundation’s Partial Motion for Summary Judgment* within twenty-one days after the motion  
11 was docketed and that any reply by TAF be filed seven days after the response is docketed. See  
12 **ECF No. 473**, at 4:20-5:1.

13 2. On December 5, 2024, TAF filed a *Partial Motion for Summary Judgment* (**ECF**  
14 **No. 477**, *et al.*), triggering a deadline for Plaintiff to respond by December 26, 2024.

15 3. Plaintiff’s undersigned counsel is participating as counsel in a federal arbitration  
16 hearing scheduled between December 9, and December 12, 2024. Thereafter, counsel must draft  
17 a complaint with a short statute of limitations deadline and address any other matters requiring  
18 immediate attention that arise during counsel’s absence from the office during the arbitration.

19 4. Plaintiff’s undersigned counsel then will be out of the office for previously  
20 scheduled holiday leave, beginning December 18, 2024.

21 5. This is the first request for an extension of these deadlines.

22 6. The request for an extension is made in good faith and not for purposes of  
23 unreasonable delay.

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1 THEREFORE:

2 7. Based on these representations, Defendants have stipulated to Plaintiff's request  
3 for an extension of time to respond to the foregoing motion and for TAF to reply thereto seven  
4 days after the response is docketed.

5 DATED this 5th day of December 2024.

6 THE PALMER LAW FIRM, P.C.

7 *Electronic Signature Authorized*

8 By: / s / **Raelene K. Palmer**

9 Raelene K. Palmer, Esq.  
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15 *Attorneys for Plaintiff, Brian Borenstein*

16 DATED this 5th day of December 2024.

17 WILEY PETERSEN

18 *Electronic Signature Authorized*

19 By: / s / **Jonathan D. Blum**

20 Jonathan D. Blum, Esq.  
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26 *Attorneys for Defendants, County of  
27 Clark and Victor Zavala*

DATED this 5th day of December 2024.

REID RUBINSTEIN & BOGATZ

*Electronic Signature Authorized*

By: / s / **Brad Lipman**

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*Attorneys for Defendants, The Animal  
Foundation and Carly Scholten*

## ORDER

IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

Dated: December 6, 2024